

Comments on FCC Proceeding 98-67, July 10, 2003 by
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Concerning Telecommunications Relay Services and Speech to Speech

1. Accents of Communications Assistants (CAs)

CAs shall have the prevailing speaking accent of the state that they are serving. People with Speech Disabilities (PSDs) have enough difficulty communicating without being forced to interpret an unfamiliar accent. This is an undue burden that may prevent many PSDs from using the service.

Providing CAs who speak in the prevailing accent of the state that they are serving is in the spirit of 47 C.F.R. § 64.604 - Mandatory minimum standards. It states under operational standards: "(1) Communications assistant (CA). ... CAs must possess clear and articulate voice communications..."

2. Outreach

TRS outreach, especially STS outreach, should be funded through NECA, as many states do not have sufficient consumers with the ability and resources necessary to effectively lobby to establish sufficient outreach at the state level.

The proportion of outreach funds devoted to potential STS users should reflect the proportion of potential TRS users who would be likely to use STS.

Example: if potential STS users constitute 13% of all potential TRS users, the amount spent for TRS outreach and education to potential STS users should constitute 13% of the amount spent on TRS outreach and education in that state. Thus, if NECA allocates \$100k for TRS outreach and education in a particular state, \$13k should be allocated to STS outreach and education. Such allocation is vital as many potential STS users cannot advocate for STS outreach due to the nature of their disability.

3. CAs Trained to Revoice

CAs will have specific training in revoicing procedures. They will receive practice calls from consumers and the provider shall test them to assure that they are successfully revoicing and carrying out all other required duties to consumers before they take live calls. Several providers adequately train CAs, but several do not.

4. Profile Access by Code Name

TRS Consumers will have access to their profile from all telephones including cell phones, not just their primary telephone. Providers may ask them to choose a code name to access their profile. Such a code name system works well for Australia STS.

5. Ability to Increase Volume of the Term

Providers shall be able to raise the volume of the term significantly. Currently, it is sometimes very difficult to hear the term.

Ability to not Hear the PSDs Voice

Users with speech disabilities may have the CA mute their voice so that the second caller only hears the CA talking. Some callers do not want their voices heard and this request should be accommodated, as some consumers are not psychologically able to use STS without this accommodation.

Ability to Access any State Relay from Out of State

Providers shall configure their STS service to enable consumers from out of state to reach the same CAs as STS consumers within the state utilize. As many states do not have STS consumers trained and available to monitor quality of service, it is essential for consumers from other states be available to do this monitoring.